

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

First-Class Mail and Periodicals
Service Standard Changes, 2021

Docket No. N2021-1

DOUGLAS F. CARLSON
NOTICE OF WITHDRAWAL OF CERTAIN INTERROGATORIES AND
REQUESTS FOR PRODUCTION OF DOCUMENTS TO THE
UNITED STATES POSTAL SERVICE

May 6, 2021

On May 3 and 4, 2021, I filed interrogatories to the United States Postal Service.¹ By filing this notice, I am withdrawing certain interrogatories because the total exceeds the limit of 25 specified in 39 C.F.R. § 3020.117.

As background, after the Commission issued Order No. 5875 to commence this proceeding,² I reviewed the Commission's Rules of Practice by following the Web site navigation at www.prc.gov to References / Rules of Practice. The page that eventually appears does not suggest that a Part 3020 of the Commission's regulations exists. The Rules of Practice do not impose a limit on the number of interrogatories. When Order No. 5875 announced the availability of discovery, the order did not mention that special rules governing the number of interrogatories applied to this proceeding.³ Although the order cited

¹ Douglas F. Carlson Interrogatories and Requests for Production of Documents to United States Postal Service Witness Robert Cintron (DFC/USPS-T1-1-15), filed May 3, 2021; Douglas F. Carlson Interrogatories and Requests for Production of Documents to United States Postal Service Witness Stephen B. Hagenstein (DFC/USPS-T3-1-12), filed May 3, 2021; Douglas F. Carlson Interrogatories and Requests for Production of Documents to United States Postal Service Witness Curtis Whiteman (DFC/USPS-T2-1), filed May 4, 2021; and Douglas F. Carlson Interrogatories and Requests for Production of Documents to United States Postal Service Witness Steven W. Monteith (DFC/USPS-T4-1-12), filed May 4, 2021.

² Order No. 5875, filed April 23, 2021.

³ *Id.* 14.

Part 3020, no statements in the order prompted me to consult Part 3020 for reference.

The Postal Service contacted me on May 5, 2021, and pointed out that a limit of 25 interrogatories applies. The Postal Service and I have agreed that I will withdraw the following interrogatories without prejudice to my right to file them again:

Cintron T-1:	1, 5, 6, and 13
Hagenstein T-3:	1 and 4
Monteith T-4:	All except 8(f)

If I file new interrogatories to any of these witnesses, I will use new interrogatory numbers.

I regret the inconvenience.

Respectfully submitted,

Dated: May 6, 2021

DOUGLAS F. CARLSON